
EXHIBIT 2

MARY JEAN EISENHOWER 6/17/2009

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF WASHINGTON AT SPOKANE

3 K.S. by her guardian ad)
4 litem, Kenneth L. Isserlis,)
5 and DOROTHY SPIOTTA and)
6 PAUL SPIOTTA,)

7 Plaintiffs,)
8)

9 vs.)
10)

11 AMBASSADOR PROGRAMS, INC.,)
12 AMBASSADORS GROUP, INC.,)
13 PEOPLE TO PEOPLE)
14 INTERNATIONAL,)

15 Defendants.)
16)

17 Cause No.
18 CV-08-243-FVS

19 DEPOSITION OF MARY JEAN EISENHOWER
20 Taken on behalf of the Plaintiff
21 June 17, 2009

MARY JEAN EISENHOWER 6/17/2009

Page 46

1 Q And what ages do you understand those programs
2 are marketed to?
3 A I believe ten and up.
4 Q Has that changed over the years?
5 A Not to my knowledge. I don't know.
6 Q What are People to People International
7 student chapters?
8 A They're very similar to adult or community
9 chapters. They're groups of people who want to stay
10 involved year-round. They would do more community --
11 international community work.
12 Q In -- where are -- strike that.
13 How many People to People International student
14 chapters are there in the United States?
15 A I believe there are around 70, but I don't
16 have an exact number.
17 Q Are there any in the state of Washington?
18 A Not to my knowledge.
19 Q Are there any in the commonwealth of Virginia?
20 A I think so, but I'm not sure. I'd have to get
21 the list out.
22 Q Where -- where would I find the list?
23 A I can have it provided.
24 Q Do you know if that's on the web site?
25 A Should be, yes.

Page 47

1 Q And do students who participate on a People to
2 People Student Ambassador program, do they automatically
3 become enrolled in a student chapter of People to People
4 International?
5 A They become members. They have a
6 complimentary membership for one year, and they can either
7 be a member at large, or they can join a chapter or start a
8 chapter if they like. Their option.
9 Q What does the complimentary membership give
10 the student?
11 A Our publications. We offer activities, such
12 as the Global Youth Forum. We offer interactive activities
13 with chapters and other students, conferences.
14 MR. KING: Katie, may we take a couple minute
15 break?
16 MS. CHAMBERLAIN: Sure.
17 (Break in proceedings.)
18 Q (By Ms. Chamberlain) Okay. We're back from
19 our break, Ms. Eisenhower. When did you first become aware
20 that K [REDACTED] returned home from a People to People
21 Student Ambassador trip ill?
22 A I don't remember the exact time, but it was
23 when I was notified that they were instigating litigation.
24 Q Did you receive that information from anyone
25 other than your attorney?

Page 48

1 A No.
2 Q Upon receiving information about
3 K [REDACTED]'s health and experience on the People to
4 People trip, were you concerned?
5 MR. KING: Objection. Vague. You may
6 respond. I don't know, without getting into what lawyers
7 told her, how she could respond to that without disclosing
8 confidential communications. Further, I don't know what
9 it's relevant to.
10 Go ahead for now.
11 A Well, generally, I'm, of course, always
12 concerned when someone's ill.
13 Q (By Ms. Chamberlain) Did you speak with anyone
14 other than your attorneys about what you had learned?
15 A No.
16 Q Have you ever spoken with anyone at
17 Ambassador Programs about K [REDACTED]?
18 A No.
19 Q Did People to People International perform an
20 investigation upon learning of K [REDACTED]'s experience?
21 A No.
22 Q Why not?
23 A Because Ambassador Programs would have done
24 that.
25 Q Do you know if they did?

Page 49

1 A I don't know.
2 Q So when you say "Ambassador Programs would
3 have done that," what do you base your testimony on?
4 A On their safety policies and their follow-up
5 on things that go wrong.
6 Q Did People to People International do anything
7 upon learning that K [REDACTED] returned from the People to
8 People trip ill?
9 MR. KING: I'm sorry. I didn't hear the
10 question, Katie.
11 Q (By Ms. Chamberlain) Did People to People
12 International do anything in response to learning that
13 K [REDACTED] had returned ill from the trip?
14 A No. We found out much later.
15 Q Have you ever tried to contact the Spiotta
16 family?
17 A No.
18 Q Do you know whether anyone at People to People
19 International learned of the Spiottas' experience prior to
20 the lawsuit being filed?
21 A Not to my knowledge.
22 Q Have you ever received any correspondence from
23 the Spiotta family?
24 A Just what I've gotten through the attorneys.
25 Q Have you ever seen any -- or strike that.

13 (Pages 46 to 49)

MARY JEAN EISENHOWER 6/17/2009

Page 176

1 CERTIFICATE OF REPORTER

2 I, Katherine M. Johnson, Registered
3 Professional Reporter, do hereby certify that the witness
4 whose testimony appears in the foregoing deposition was
5 duly sworn by me; the testimony of said witness was taken
6 by me to the best of my ability and thereafter reduced to
7 typewriting under my direction; that I am neither counsel
8 for, related to, nor employed by any of the parties to the
9 action in which this deposition was taken, and further that
10 I am not a relative or employee of any attorney or counsel
11 employed by the parties thereto, nor financially or
12 otherwise interested in the outcome of the action.

13
14
15 _____
Katherine M. Johnson, RPR
16
17
18
19
20
21
22
23
24
25